
EXHIBIT M6

WATER QUALITY MANAGEMENT PERMIT
PUMP STATION NO. 4



Pennsylvania Department of Environmental Protection

2 East Main Street
Norristown, PA 19401

November 1, 2005

Southeast Regional Office

Phone: 484-250-5970

Fax: 484-250-5971

Mr. Hugh Murray, Manager
Willistown Township
688 Sugartown Road
Malvern, PA 19355

Re: Willistown-Bryn Mawr Rehab Pump Station
Sewerage 1505406
File Type: Permit
Willistown Township
Chester County

Dear Mr. Murray:

Your permit is enclosed.

You must comply with all Standard and Special Conditions attached to this Permit. Construction must be done in accordance with the permit application and all supporting documentation. Please review the permit conditions and the supporting documentation submitted with your application before starting construction.

The Department of Environmental Protection (Department) also hereby approves the plan for decommissioning the existing Bryn Mawr Rehabilitation Hospital Waste Water Treatment Plant. Upon completion of the pump station, you must notify the Department so we can conduct a final inspection. Once the Department approves operation of the pump station, the treatment plant may be taken off-line in accordance with the approved decommissioning plan. Also notify the Department when the treatment plant is fully decommissioned so that the existing permits may be cancelled.

Enclosed is the "Sewage and Industrial Wastewater Facilities Construction Certification" form. A Pennsylvania-registered Professional Engineer must sign and complete this form prior to startup of the facilities (See Standard Conditions). You or your authorized representative must also sign the form. This certification and other post-construction documentation must be submitted to the Department.

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717-787-3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800-654-5984. Appeals must be filed



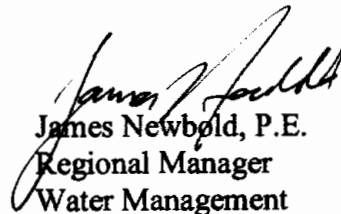
with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in braille or on audiotape from the Secretary to the Board at 717-787-3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST REACH THE BOARD WITHIN 30 DAYS. YOU DO NOT NEED A LAWYER TO FILE AN APPEAL WITH THE BOARD.

IMPORTANT LEGAL RIGHTS ARE AT STAKE, HOWEVER, SO YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD (717-787-3483) FOR MORE INFORMATION.

If you have any questions, please call Mr. David Talley at 484-250-5181.

Sincerely,



James Newbold, P.E.
Regional Manager
Water Management

Enclosures

cc: Mr. Duerr - Applied Water Management, Inc.
Operations Section
Water Management
Permits Chief
File
Re (AR05WQM)141-17



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER SUPPLY AND WASTEWATER MANAGEMENT

**WATER QUALITY MANAGEMENT
PERMIT**

PERMIT NO. 1505406

AMENDMENT NO. _____

APS ID 546140AUTH ID 583306

<p>A. PERMITTEE (Name and Address): Willistown Township 688 Sugartown Road Malvern, PA 19355</p>	<p>CLIENT ID#: 86424</p>	<p>B. PRIMARY FACILITY (Name): Willistown – Bryn Mawr Rehab Pump Station</p>
<p>C. LOCATION (Municipality, County): Willistown Township Chester County</p>		<p>SITE ID#: 255715</p>
<p>D. This permit approves the construction and operation of sewerage facilities consisting of: A new pump station with associated force main and gravity lines, and an upgrade of existing pump Station No. 3.</p>		
<p>Pump Stations: <u>2</u> Design Capacity: <u>250 and 1,300</u> GPM Average Annual Flow: <u>19,440 and 445,000</u> GPD</p>	<p>Manure Storage: Volume _____ MG Freeboard: _____ inches</p>	<p>Industrial Wastewater/Sewage Treatment Facility: Annual Average Flow: _____ MGD Design Hydraulic Capacity: _____ MGD Design Organic Capacity: _____ lb/day</p>
<p>E. APPROVAL GRANTED BY THIS PERMIT IS SUBJECT TO THE FOLLOWING:</p> <p>1. New Permits: All construction, operations, and procedures shall be in accordance with the Water Quality Management Permit application dated <u>01/27/05</u>, its supporting documentation, and addendums dated <u>05/10/05</u>, which are hereby made a part of this permit.</p> <p>Amendments: All construction, operations, and procedures shall be in accordance with the Water Quality Management Permit Amendment application dated _____ and its supporting documentation, and addendums dated _____, which are hereby made a part of this amendment.</p> <p>Except for any herein approved modifications, all terms, conditions, supporting documentation and addendums approved under Water Quality Management Permit No. _____ dated _____ shall remain in effect.</p> <p>Transfers: Water Quality Management Permit No. _____ dated _____ and conditions, supporting documentation and addendums are also made part of this transfer.</p> <p>2. Permit Conditions Relating to sewerage are attached and made part of this permit.</p> <p>3. Special Conditions numbered <u>1</u> are attached and made part of this permit.</p>		
<p>F. THE AUTHORITY GRANTED BY THIS PERMIT IS SUBJECT TO THE FOLLOWING FURTHER QUALIFICATIONS:</p> <p>1. If there is a conflict between the application or its supporting documents and amendments and the attached conditions, the attached conditions shall apply.</p> <p>2. Failure to comply with the rules and regulations of DEP or with the terms or conditions of this permit shall void the authority given to the permittee by the issuance of this permit.</p> <p>3. This permit is issued pursuant to the Clean Streams Law Act of June 22, 1937, P.L. 1987, <u>as amended</u> 35 P.S. §691.1 <i>et seq.</i> Issuance of this permit shall not relieve the permittee of any responsibility under any other law.</p>		
<p>PERMIT ISSUED: November 1, 2005</p>		<p>BY: <u><i>James J. Hall</i></u> TITLE: <u>Water Management Program Manager</u></p>

**Sewerage Permit No. 1505406
Willistown Township
Chester County**

This permit is subject to the following Special Condition(s):

- I. The Department authorizes the construction of the referenced sewerage facilities. The Department recognizes that the facilities were designed to accommodate future flows for which Sewage Facilities Planning Approval has not been granted. Flows in the pump station, force main, and gravity lines must be restricted in accordance with the Department's October 20, 2004, Planning Approval letter, until such time as further sewage facilities planning is adopted by Willistown Township and approved by the Department.

Re 30 (AR05WQM)141-19



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER SUPPLY AND WASTEWATER MANAGEMENT

PERMIT CONDITIONS RELATING TO SEWERAGE
For use in Water Quality Management Permits

(Place a ✓ in the box that applies)

- ☒ 1. Consistent with the Department of Environmental Protection's (DEP) technical guidance document *Conducting Technical Reviews of Water Quality Management Permit Wastewater Treatment Facilities* (DEP ID: 362-2000-007) available on DEP's website at www.dep.state.pa.us. DEP considers the registered Professional Engineer whose seal is affixed to the design documents to be fully responsible for the adequacy of all aspects of the facility design.
- ☒ 2. The permittee shall adopt and enforce an ordinance requiring the abandonment of privies, cesspools or similar receptacles for human waste and onlot sewage disposal systems on the premises of occupied structures accessible to public sewers. All such structures must be connected to the public sewers.
- ☐ 3. The outfall sewer or drain shall be extended to the low water mark of the receiving body of water. Where necessary to ensure proper mixing and waste assimilation, an outfall sewer or drain may be extended with appurtenances below the low water mark and into the bed of a navigable stream provided that the permittee has secured an easement, right-of-way, license or lease from DEP in accordance with Section 15 of the Dam Safety and Encroachments Act, the Act of November 26, 1978, P.L. 1375, as amended.
- ☒ 4. The approval is specifically made contingent on the permittee acquiring all necessary property rights, by easement or otherwise, providing for the satisfactory construction, operation, maintenance and replacement of all sewers or sewerage structures in, along or across private property with full rights of ingress, egress and regress.
- ☒ 5. When construction of the approved sewerage facilities is completed and before they are placed in operation, the permittee shall notify DEP in writing so that a DEP representative may inspect the facilities.
- ☒ 6. If, at any time, the sewerage facilities covered by this permit create a public nuisance, including but not limited to, causing malodors or causing environmental harm to waters of the Commonwealth, DEP may require the permittee to adopt appropriate remedial measures to abate the nuisance or harm.
- ☐ 7. This permit authorizes the construction and operation of the proposed sewerage facilities until such time as facilities for conveyance and treatment at a more suitable location are installed and capable of receiving and treating the permittee's sewage. Such facilities must be in accordance with the applicable municipal official plan adopted pursuant to Section 5 of the Pennsylvania Sewage Facilities Act, the Act of January 24, 1966, P.L. 1535 as amended. When such municipal sewerage facilities become available, the permittee shall provide for the conveyance of the sewage to these sewerage facilities, abandon the use of these approved facilities and notify DEP accordingly. This permit shall then, upon notice from DEP, terminate and become null and void and shall be relinquished to DEP.
- ☒ 8. This permit does not relieve the permittee of its obligations to comply with all federal, interstate, state or local laws, ordinances and regulations applicable to the sewerage facilities.
- ☒ 9. This permit does not give any real or personal property rights or grant any exclusive privileges, nor shall it be construed to grant or confirm any right, easement or interest in, on, to or over any lands which belong to the Commonwealth.
- ☐ 10. The authority granted by this permit is subject to all effluent requirements, monitoring requirements and other conditions as set forth in NPDES Permit No. PA_____ and all subsequent amendments and renewals. No discharge is authorized from these facilities unless approved by an NPDES Permit.

- ☒ 11. An Erosion and Sedimentation (E&S) Plan must be developed prior to construction of the permitted facility, pursuant to Title 25 Pa. Code Chapter 102, and implemented during and after the earth disturbance activity.

If the activity involves 5 or more acres of earth disturbance, or from 1 to 5 acres of earth disturbance with a point source discharge to surface waters of the Commonwealth, an NPDES permit for the Discharge of Stormwater Associated with Construction Activity is required.

In addition to the state NPDES permitting requirements, some municipalities, through local ordinances, require the E&S Control Plan to be reviewed and approved by the local County Conservation District office prior to

construction. For specific information regarding E&S control planning approval and NPDES permitting requirements, please contact your local County Conservation District office.

- ☒ 12. The facilities shall be constructed under the supervision of a Pennsylvania registered Professional Engineer in accordance with the approved reports, plans and specifications.
- ☒ 13. A Pennsylvania registered Professional Engineer shall certify that construction of the permitted facilities was completed in accordance with the application and design plans submitted to DEP, using "Post Construction Certification" (3800-PM-WSWM0179a). It is the permittee's responsibility to ensure that a Professional Engineer is on-site to provide the necessary oversight and/or inspections to certify the facilities. The certification must be submitted to DEP before the facility is placed in operation. If requested, "as-built" drawings, photographs (if available) and a description of any DEP-approved deviations from the application and design plans must be submitted to DEP within 30 days of certification.
- ☒ 14. Manhole inverts shall be formed to facilitate the flow of the sewage and to prevent the stranding of sewage solids. The manhole structure shall be built to prevent undue infiltration, entrance of street wash or grit and provide safe access to facilitate manhole maintenance activities.
- ☐ 15. The local Waterways Conservation Officer of the Pennsylvania Fish and Boat Commission (PFBC) shall be notified when the construction of any stream crossing and/or outfall is started and completed. A written permit must be secured from the PFBC if the use of explosives in any waterways is required and the permittee shall notify the local Waterways Conservation Officer when explosives are to be used.

- ☒ 16. The permittee shall maintain records of "as-built" plans showing all the treatment facilities as actually constructed together with facility operation and maintenance (O&M) manuals and any other relevant information that may be required. Upon request, the "as-built" plans and O&M manuals shall be filed with DEP.
- ☒ 17. The sewers shall have adequate foundation support as soil conditions require. Trenches shall be back-filled to ensure that sewers will have proper structural stability, with minimum settling and adequate protection against breakage. Concrete used in connection with these sewers shall be protected from damage by water, freezing, drying or other harmful conditions until cured.
- ☒ 18. Stormwater from roofs, foundation drains, basement drains or other sources shall not be admitted directly to the sanitary sewers.
- ☒ 19. The approved sewers shall be maintained in good condition, kept free of deposits by flushing or other cleaning methods and repaired when necessary.
- ☒ 20. The sewerage facilities shall be properly operated and maintained to perform as designed.
- ☒ 21. The attention of the permittee is called to the highly explosive nature of certain gases generated by the digestion of sewage solids when these gases are mixed in proper proportions with air and to the highly toxic character of certain gases arising from such digestion or from sewage in poorly ventilated compartments or sewers. Therefore, at all places throughout the sewerage facilities where hazard of fire, explosion or danger from toxic gases may occur, the permittee shall post conspicuous permanent and legible warnings. The permittee shall instruct all employees concerning the aforesaid hazards, first aid and emergency methods of meeting such hazards and shall make all necessary equipment and material accessible.
- ☐ 22. An operator certified in accordance with the Water and Wastewater Systems Operator Certification Act of February 21, 2002, 63 P.S. §§1001, *et seq.* shall operate the sewage treatment plant.
- ☒ 23. The permittee shall properly control any industrial waste discharged into its sewerage system by regulating the rate and quality of such discharge, requiring necessary pretreatment and excluding industrial waste, if necessary, to protect the integrity or operation of the permittee's sewerage system.
- ☒ 24. There shall be no physical connection between a public water supply system and a sewer or appurtenance to it which would permit the passage of any sewage or polluted water into the potable water supply. No water pipe shall pass through or come in contact with any part of a sewer manhole.
- ☐ 25. All connections to the approved sanitary sewers must be in accordance with the corrective action plan as contained in the approved Title 25 Pa. Code Chapter 94 Municipal Wasteload Management Annual Report.
- ☐ 26. Collected screenings, slurries, sludge and other solids shall be handled and disposed of in compliance with Title 25 Pa. Code Chapters 271, 273, 275, 283 and 285 (related to permits and requirements for land filling, land application, incineration and storage of sewage sludge), Federal Regulations 40 CFR 257 and the Federal Clean Water Act and its amendments.

LICENSING/PERMIT QUESTIONNAIRE

1. For what type of license or permit did you apply? Please see the reverse for license/permit types and enter the number that precedes the appropriate permit type. # _____
2. Are you the ☐ Applicant ☐ Consultant
3. Was the permit application prepared by the ☐ Applicant ☐ Consultant ☐ Both
4. Please indicate the county in which the facility or activity exists. _____ County
5. How long did it take to get your license/permit? Please specify. _____
6. Do you think this was: ☐ Too Long ☐ Reasonable ☐ Faster Than Expected
7. Did you have to resubmit or revise your application? ☐ Yes ☐ No
If yes, why? ☐ Administratively Incomplete ☐ Technically Incomplete
☐ Administrative Errors ☐ Technical Errors ☐ Other (Explain)
8. Did you attend a pre-application conference with DEP? ☐ Yes ☐ No
9. Did DEP staff visit the site or facility during the course of the permit review?
☐ Yes _____ Number of Visits ☐ No ☐ Unknown
10. Had you previously applied for any DEP permit? ☐ Yes ☐ No

11.	The Department provides a reasonable explanation of all administrative requirements of the application.			
	Strongly Agree	Agree	Disagree	Strongly Disagree
	1	2	3	4
12.	The Department provides a reasonable explanation of all technical requirements of the application.			
	Strongly Agree	Agree	Disagree	Strongly Disagree
	1	2	3	4
13.	DEP staff presented a professional appearance when performing on-site visits or meetings.			
	Strongly Agree	Agree	Disagree	Strongly Disagree
	1	2	3	4
14.	I was treated courteously and professionally by DEP staff.			
	Strongly Agree	Agree	Disagree	Strongly Disagree
	1	2	3	4
15.	Do you have suggestions for improvements to the licensing or permit application process? (Attach additional			

[illegible]

TYPES OF DEP LICENSES / PERMITS

(PLEASE NOTE: The numbers associated with these permits are strictly intended for the purposes of evaluating this survey. They are not to be considered the official number for each permit and are not to be used when requesting information on a permit that has been submitted or for receiving application materials for other permits.)

AIR PLAN APPROVALS

- 100 Prevention of Significant Deterioration (PSD)
- 110 Major Source in Non-Attainment
- 120 New Source Performance Standard (NSPS)
- 130 Waste Incineration/Burning
- 140 General (Other)

BLASTING

- 150 Blaster's License
- 160 Explosives Storage Permit
- 170 Explosives Purchase/Sale Permit

MISCELLANEOUS

- 180 Earth Disturbance Permit

HAZARDOUS WASTE

- 190 Storage Facility Permit
- 200 Waste Piles Permit
- 210 Landfill Permit
- 220 Incinerator Permit
- 230 Chem/Phys/Bio Treatment Permit
- 240 Surface Impoundment Permit
- 250 Land Treatment Permit
- 260 Thermal Treatment Permit
- 270 Transporter License
- 280 Commercial Treatment/Disposal

INDUSTRIAL WASTE/WATER

- 290 NPDES (Part 1) Permit
- 300 Water Quality Management (Part 2)

INFECTIOUS & CHEMOTHERAPEUTIC WASTE

- 310 Transporter License

MINING

- 320 Letter of Authorization
- 330 Equipment Approval
- 340 Noncoal Mining Activity Permit
- 350 Refuse Bank Reprocessing Permit
- 360 Surface Coal Mining Permit
- 370 Underground Coal Mining Permit
- 380 Coal Prep Plant Permit
- 390 Coal Refuse Disposal Permit
- 400 Coal Surface Mining License
- 410 Noncoal Surface Mining License
- 420 Coal Extraction
- 430 Incidental Extraction

RADIATION

- 440 Radioactive Material License

SEWAGE

- 450 Planning Approval/Base Planning
- 460 Planning Approval/New Land Development
- 470 NPDES Part 1 for Sewage
- 480 Water Quality Management Part 2 Permit

MUNICIPAL/RESIDUAL WASTE

- 490 Residual Waste Processing and/or Disposal Permit
- 500 Municipal Waste Landfill Permit
- 510 Construction/Demolition Waste Landfill Permit
- 520 Incineration/Resource Recovery Facility Permit
- 530 Agricultural Utilization of Sewage Sludge Facility Permit
- 540 Demonstration Facility Permit
- 550 Land Reclamation of Sewage Sludge Facility Permit
- 560 Land Disposal of Sewage Sludge Facility Permit
- 570 Transfer Facility Permit
- 580 Municipal Waste Processing Facility Permit
- 590 Compost Facility Permit

OIL AND GAS WELLS

- 600 Oil and Gas Well Permit
- 610 Oil and Gas Well Registration
- 620 Oil and Gas Well Bond
- 630 Oil and Gas Well Coal Pillar Permit
- 640 Orphan Well Classification
- 650 Oil and Gas NPDES Permit Part 1/GP
- 660 Clean Streams Law Part 2 Permit

PUBLIC WATER SUPPLY

- 670 Public Water System Permit - Community Water System
- 680 Public Water System Permit - Bottled or Vended System
- 690 Public Water System Permit - Bulk Water Haulers
- 700 Non-Community Water System Approval
- 710 Non-Community Water System Permit
- 720 Water Allocation Permit

WATERWAY ACTIVITIES

- 730 Water Obstruction/Encroachment Permit